

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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VAUGH SCHOTT, NIGERIA SCOTT, PRINCE
SCOTT, ANDRE HARRIS, BRENDA SCOTT,
KRAIG UTLEY, COREY MARROW, A.S.,
A MINOR CHILD, K.M., A MINOR CHILD,
AND JULIAN RENE,

Index No. 14-cv-4441(KMK)

Notice of Motion

Plaintiffs,

against --

THE CITY OF MOUNT VERNON, a municipal
Entity, MT. VERNON POLICE OFFICER ALLEN,
MT. VERNON POLICE OFFICER CAMILO
ANTONINI, MT. VERNON POLICE OFFICER
TIMOTHY BRILEY, MT. VERNON POLICE
OFFICER DET. BRENT GAMBLE, MT. VERNON
POLICE OFFICER SGT. STEVEN SEXTON,
CITY OF MOUNT VERNON POLICE
DEPARTMENT, AND POLICE OFFICERS JOHN
DOES 1-10,

Defendants.

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PLEASE TAKE NOTICE that upon the Declaration of David A. Thompson,
dated April 6, 2016, the exhibits annexed thereto, the accompanying Memorandum of
Law, dated April 6, 2016, and all pleadings and proceedings previously had herein, the
plaintiffs will move before Honorable Kenneth M. Karas, on August 7, 2015, at the
United States Courthouse for the Southern District of New York, located at The Hon.
Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas St.
White Plains, NY, for an Order pursuant to Fed. R. Civ. P. 56 for partial summary
judgment in the plaintiffs' favor and against all individual defendants for Claims One,
Claim Two, Claim Three, and Claim Four, and against the City of Mount Vernon for
Claim Eight in the Complaint.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's February 9, 2016 Order, docket entry [18], any opposition must be filed by May 13, 2016.

DATED: New York, New York

April 8, 2016

Respectfully submitted,

//s//

DAVID A. THOMPSON [DT 3991]

STECKLOW & THOMPSON

ATTORNEYS FOR PLAINTIFF

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